#### **EXHIBIT T**

# Redacted Version of Document Sought to be Sealed

#### Case 4:20-cv-03664-YGR Document 684-15 Filed 08/11/22 Page 2 of 6 HIGHLY CONFIDENTIAL

```
1
                 IN THE UNITED STATES DISTRICT COURT
 2
              FOR THE NORTHERN DISTRICT OF CALIFORNIA
 3
                          SAN JOSE DIVISION
 4
                              ---000---
 5
     CHASOM BROWN, et al.,
     on behalf of themselves and )
     all others similarly
6
     situated,
 7
               Plaintiffs,
                                    )Case No.
                                     )5:20-cv-03664-LHK
8
     VS.
9
     GOOGLE LLC,
10
               Defendant.
11
12
13
                              ---000---
14
                    Videotaped Zoom Deposition of
15
                          LORRAINE TWOHILL
16
                         Highly Confidential
                         Friday, May 6, 2022
17
                              ---000---
18
19
20
21
22
23
    Katy E. Schmidt
    RPR, RMR, CRR, CSR 13096
24
25
    Veritext Job No.: 5211818
                                                Page 1
```

## Case 4:20-cv-03664-YGR Document 684-15 Filed 08/11/22 Page 3 of 6 HIGHLY CONFIDENTIAL

1	shared in that meeting would have been I don't	11:58
2	remember it in detail. I don't remember the research.	
3	But I believe that there were some slides that day	11:58
4	talking about research or summarizing research the	11:58
5	team had done.	11:58
6	Q. And would that research that the team had	11:58
7	done indicate that some consumers were confused about	11:58
8	the use of the icon on the slide screen?	11:58
9	MR. SCHAPIRO: Objection. Vague.	11:58
10	Ambiguous.	11:58
11	THE WITNESS: And I really don't remember.	11:58
12	I'd need to see the research.	11:58
13	BY MR. YANCHUNIS:	
14	Q. And in connection with maintenance, Sundar	11:58
15	didn't want to put incognito under the spotlight.	11:58
16	Do you know what that referenced?	11:58
17	A. Again, I'm going from memory, and I don't	11:59
18	remember all the details of that conversation. But I	11:59
19	do know we were preparing for I/O, which is our big	11:59
20	product event, which is was a few weeks later, and	11:59
21	were typically only putting a spotlight on new	11:59
22	announcements and new features at I/O. And we were	11:59
23	rolling incognito out to search, maps, and I think it	11:59
24	was YouTube.	11:59
25	And so that was our focus. And we did	11:59
	Page 82	

## Case 4:20-cv-03664-YGR Document 684-15 Filed 08/11/22 Page 4 of 6 HIGHLY CONFIDENTIAL

1	actually, in fact, talk about incognito mode in Chrome	11:59
2	there too.	11:59
3	Q. Okay. And so Sundar, as used in this	11:59
4	e-mail, refers to Sundar Pichai; correct?	11:59
5	A. Correct.	11:59
6	Q. And what is the I slash O? What does that	11:59
7	reference?	11:59
8	A. That's the event I just mentioned, I/O.	11:59
9	It's an event we have once a year. It's actually next	11:59
10	week. It's an event we have once a year where we talk	11:59
11	about product updates. It's usually about 90 minutes	11:59
12	long. It's an important moment for the company.	11:59
13	Q. Okay. And is that given to the general	12:00
14	public or to investors or just internally to employees	12:00
15	at the company?	12:00
16	A. It's the main audience are developers and	12:00
17	some press attend too.	12:00
18	Q. Okay. And these developers are individuals	12:00
19	or entities outside of Google's employ?	12:00
20	A. Yes, they are.	12:00
21	Q. Are you familiar with an individual by the	12:00
22	name of Tom Oliveri?	12:00
23	A. Yes, I am.	12:00
24	Q. And what position did Mr. Oliveri hold back	12:00
25	on April 20th or excuse me April 30th of 2019?	12:00
	Page 83	

## Case 4:20-cv-03664-YGR Document 684-15 Filed 08/11/22 Page 5 of 6 HIGHLY CONFIDENTIAL

1	me.	01:47
2	A. I found it.	01:47
3	Q. Okay. Would you read aloud the first	01:47
4	sentence after "Make Incognito Mode Truly Private"?	01:47
5	A. So the document says:	01:47
6		01:47
7		01:47
8		01:47
9		01:47
10		01:47
11		01:47
12		01:47
13	Q. Has Google implemented these changes to make	01:47
14	incognito truly private?	01:47
15	MR. SCHAPIRO: Objection. Foundation.	01:47
16	THE WITNESS: To be honest, I'm not sure. I	01:48
17	believe we've done the default turning cookie blocking	01:48
18	on, as I think it's on that tab page you spoke about	01:48
19	earlier. And I think you can use the free VPN through	01:48
20	Google one account. I'm not I'm not an expert on	01:48
21	that, though.	01:48
22	BY MR. YANCHUNIS:	01:48
23	Q. Has Google implemented any of these changes	01:48
24	to Chrome Incognito Mode?	01:48
25	MR. SCHAPIRO: Objection. Foundation.	01:48
	Page 120	

## Case 4:20-cv-03664-YGR Document 684-15 Filed 08/11/22 Page 6 of 6 HIGHLY CONFIDENTIAL

Tasfer with Google' narrative across our products.  And part of that framework was to build products from 02:21 the get-go with privacy built in related to your 02:21 Google account, and all of that work. 02:21 And that was what I was referencing. 02:21 With changes to Chrome Incognito Mode to make it truly 02:21 with changes to Chrome Incognito Mode to make it truly 02:21 private? 02:21 A. I really don't think we ever discussed 02:21 incognito mode in that context. 02:21 The work I've done with Luiz and Rahul and 02:21 Jen was all around the user settings. And especially 02:21 the work we're launching at I/O, which was auto 02:21 history, video history, user settings across search 02:21 history, video history. And really all of that work 02:22 that we've done over the years. 02:22 Q. Do you know if Mr. Pichai did it as you 02:22 asked him to? 02:22 A. I have no idea. 02:22 It's a document which contains a Bates range of 02:22 4739271, through 4739316. And I only have a few 02:22 questions about a few pages in that document. 02:22 A. Okay. Just opening it. 02:23 Page 131			
the get-go with privacy built in related to your  Google account, and all of that work.  Q:21  And that was what I was referencing.  Q. And did that include pushing the PAs to help with changes to Chrome Incognito Mode to make it truly private?  A. I really don't think we ever discussed incognito mode in that context.  The work I've done with Luiz and Rahul and with ever all around the user settings. And especially the work we're launching at I/O, which was auto delete, location history, user settings across search history, video history. And really all of that work that we've done over the years.  Q. Do you know if Mr. Pichai did it as you asked him to?  Q. Let me direct your attention to Exhibit 14.  Lit's a document which contains a Bates range of questions about a few pages in that document.  Q:222 A. Okay. Just opening it.  O2:23	1	"Safer with Google" narrative across our products.	02:21
Google account, and all of that work.  And that was what I was referencing.  Q. And did that include pushing the PAs to help with changes to Chrome Incognito Mode to make it truly private?  A. I really don't think we ever discussed 02:21  The work I've done with Luiz and Rahul and Derivate and all around the user settings. And especially the work we're launching at I/O, which was auto delete, location history, user settings across search history, video history. And really all of that work that we've done over the years. Q. Do you know if Mr. Pichai did it as you asked him to? Q. Let me direct your attention to Exhibit 14. Users This a document which contains a Bates range of questions about a few pages in that document. Questions about a few pages in that document. Questions about a few pages in that document. Questions document with opening it. Questions document opening it.	2	And part of that framework was to build products from	02:21
And that was what I was referencing.  Q. And did that include pushing the PAs to help Q:21  with changes to Chrome Incognito Mode to make it truly private?  A. I really don't think we ever discussed 02:21  incognito mode in that context.  The work I've done with Luiz and Rahul and 22:21  Jen was all around the user settings. And especially the work we're launching at I/O, which was auto delete, location history, user settings across search history, video history. And really all of that work that we've done over the years.  Q. Do you know if Mr. Pichai did it as you  22:22  A. I have no idea.  Q. Let me direct your attention to Exhibit 14.  It's a document which contains a Bates range of questions about a few pages in that document.  A. Okay. Just opening it.  02:22  ////  22:23	3	the get-go with privacy built in related to your	02:21
Q. And did that include pushing the PAs to help 02:21  with changes to Chrome Incognito Mode to make it truly 02:21  private? 02:21  A. I really don't think we ever discussed 02:21  incognito mode in that context. 02:21  The work I've done with Luiz and Rahul and 02:21  Jen was all around the user settings. And especially 02:21  the work we're launching at I/O, which was auto 02:21  delete, location history, user settings across search 02:21  history, video history. And really all of that work 02:22  that we've done over the years. 02:22  Q. Do you know if Mr. Pichai did it as you 02:22  asked him to? 02:22  A. I have no idea. 02:22  It's a document which contains a Bates range of 02:22  4739271, through 4739316. And I only have a few 02:22  A. Okay. Just opening it. 02:23	4	Google account, and all of that work.	02:21
with changes to Chrome Incognito Mode to make it truly private? 02:21  A. I really don't think we ever discussed 02:21  incognito mode in that context. 02:21  The work I've done with Luiz and Rahul and 02:21  Jen was all around the user settings. And especially 02:21  the work we're launching at I/O, which was auto 02:21  delete, location history, user settings across search 02:21  history, video history. And really all of that work 02:22  that we've done over the years. 02:22  Q. Do you know if Mr. Pichai did it as you 02:22  asked him to? 02:22  A. I have no idea. 02:22  It's a document which contains a Bates range of 02:22  4739271, through 4739316. And I only have a few 02:22  questions about a few pages in that document. 02:22  A. Okay. Just opening it. 02:23	5	And that was what I was referencing.	02:21
A. I really don't think we ever discussed 02:21 incognito mode in that context. 02:21  The work I've done with Luiz and Rahul and 02:21  Jen was all around the user settings. And especially 02:21 the work we're launching at I/O, which was auto 02:21  delete, location history, user settings across search 02:21 history, video history. And really all of that work 02:22 that we've done over the years. 02:22  Q. Do you know if Mr. Pichai did it as you 02:22 asked him to? 02:22  A. I have no idea. 02:22  Q. Let me direct your attention to Exhibit 14. 02:22  It's a document which contains a Bates range of 02:22 4739271, through 4739316. And I only have a few 02:22 questions about a few pages in that document. 02:22  A. Okay. Just opening it. 02:23	6	Q. And did that include pushing the PAs to help	02:21
A. I really don't think we ever discussed 02:21 incognito mode in that context. 02:21  The work I've done with Luiz and Rahul and 02:21  Jen was all around the user settings. And especially 02:21 the work we're launching at I/O, which was auto 02:21 delete, location history, user settings across search 02:21 history, video history. And really all of that work 02:22 that we've done over the years. 02:22 Q. Do you know if Mr. Pichai did it as you 02:22 asked him to? 02:22 A. I have no idea. 02:22 Q. Let me direct your attention to Exhibit 14. 02:22 It's a document which contains a Bates range of 02:22 4739271, through 4739316. And I only have a few 02:22 questions about a few pages in that document. 02:22 A. Okay. Just opening it. 02:23	7	with changes to Chrome Incognito Mode to make it truly	02:21
incognito mode in that context.  10	8	private?	02:21
The work I've done with Luiz and Rahul and 02:21  Jen was all around the user settings. And especially 02:21  the work we're launching at I/O, which was auto 02:21  delete, location history, user settings across search 02:21  history, video history. And really all of that work 02:22  that we've done over the years. 02:22  Q. Do you know if Mr. Pichai did it as you 02:22  asked him to? 02:22  A. I have no idea. 02:22  Q. Let me direct your attention to Exhibit 14. 02:22  It's a document which contains a Bates range of 02:22  4739271, through 4739316. And I only have a few 02:22  questions about a few pages in that document. 02:22  A. Okay. Just opening it. 02:23	9	A. I really don't think we ever discussed	02:21
Jen was all around the user settings. And especially the work we're launching at I/O, which was auto 02:21 delete, location history, user settings across search 02:21 history, video history. And really all of that work 02:22 that we've done over the years. 02:22  Q. Do you know if Mr. Pichai did it as you 02:22 asked him to? 02:22  A. I have no idea. 02:22  1t's a document which contains a Bates range of 02:22 1t's a document which contains a Bates range of 02:22 questions about a few pages in that document. 02:22 A. Okay. Just opening it. 02:23	10	incognito mode in that context.	02:21
the work we're launching at I/O, which was auto  02:21  delete, location history, user settings across search  15 history, video history. And really all of that work  16 that we've done over the years.  17 Q. Do you know if Mr. Pichai did it as you  18 asked him to?  19 A. I have no idea.  10 Q. Let me direct your attention to Exhibit 14.  10 Q:22  21 It's a document which contains a Bates range of  22 4739271, through 4739316. And I only have a few  23 questions about a few pages in that document.  25 Q:22  26 A. Okay. Just opening it.  27 O2:23  28 O2:22	11	The work I've done with Luiz and Rahul and	02:21
delete, location history, user settings across search  history, video history. And really all of that work  that we've done over the years.  Q. Do you know if Mr. Pichai did it as you  asked him to?  A. I have no idea.  Q. Let me direct your attention to Exhibit 14.  1t's a document which contains a Bates range of  4739271, through 4739316. And I only have a few  questions about a few pages in that document.  A. Okay. Just opening it.  02:22  ///  22  ///  23  ///  26  O2:22  ///  O2:23	12	Jen was all around the user settings. And especially	02:21
history, video history. And really all of that work  that we've done over the years.  Q. Do you know if Mr. Pichai did it as you  02:22  asked him to?  A. I have no idea.  Q. Let me direct your attention to Exhibit 14.  11 t's a document which contains a Bates range of  12 t's a document which contains a Bates range of  13 questions about a few pages in that document.  14 Q:22  25 A. Okay. Just opening it.  16 that work  17 Q:22  18 D2:22  18 asked him to?  18 D2:22  19 A. Okay. Just opening it.  10 D2:22  10 D2:22  11 T's a document which contains a Bates range of  12 D2:22  13 Questions about a few pages in that document.  14 D2:22  15 D2:23	13	the work we're launching at I/O, which was auto	02:21
that we've done over the years.  Q. Do you know if Mr. Pichai did it as you  02:22  18 asked him to?  A. I have no idea.  Q. Let me direct your attention to Exhibit 14.  11 it's a document which contains a Bates range of  12:22  23 questions about a few pages in that document.  24 A. Okay. Just opening it.  25 ///  26 02:22  27 02:22  28 02:22  29 02:22  20 02:22  20 02:22  20 02:22  21 02:22  22 02:22  23 questions about a few pages in that document.  20:22  21 02:22  22 02:23	14	delete, location history, user settings across search	02:21
Q. Do you know if Mr. Pichai did it as you 02:22  asked him to? 02:22  A. I have no idea. 02:22  Q. Let me direct your attention to Exhibit 14. 02:22  It's a document which contains a Bates range of 02:22  4739271, through 4739316. And I only have a few 02:22  questions about a few pages in that document. 02:22  A. Okay. Just opening it. 02:23	15	history, video history. And really all of that work	02:22
asked him to?  18 asked him to?  20 A. I have no idea.  21 It's a document which contains a Bates range of  22 4739271, through 4739316. And I only have a few  23 questions about a few pages in that document.  24 A. Okay. Just opening it.  25 ///  26 22 23 25 26 27	16	that we've done over the years.	02:22
A. I have no idea.  Q. Let me direct your attention to Exhibit 14.  11	17	Q. Do you know if Mr. Pichai did it as you	02:22
Q. Let me direct your attention to Exhibit 14. 02:22  It's a document which contains a Bates range of 02:22  4739271, through 4739316. And I only have a few 02:22  questions about a few pages in that document. 02:22  A. Okay. Just opening it. 02:23	18	asked him to?	02:22
It's a document which contains a Bates range of 02:22  4739271, through 4739316. And I only have a few 02:22  questions about a few pages in that document. 02:22  A. Okay. Just opening it. 02:22  /// 02:23	19	A. I have no idea.	02:22
22 4739271, through 4739316. And I only have a few 02:22 23 questions about a few pages in that document. 02:22 24 A. Okay. Just opening it. 02:22 25 /// 02:23	20	Q. Let me direct your attention to Exhibit 14.	02:22
questions about a few pages in that document. 02:22  A. Okay. Just opening it. 02:22  /// 02:23	21	It's a document which contains a Bates range of	02:22
24 A. Okay. Just opening it. 02:22 25 /// 02:23	22	4739271, through 4739316. And I only have a few	02:22
25 /// 02:23	23	questions about a few pages in that document.	02:22
	24	A. Okay. Just opening it.	02:22
Page 131	25	///	02:23
Page 131		e 131	